



- Performed various tasks as first-chair counsel in *Ex parte Warren Calhoun* (W16-54594-N(A)), including appearing at a live evidentiary hearing, reviewing the hearing record, and filing the State's Proposed Findings of Fact and Conclusions of Law;
- Prepared and presented a 1-hour case study on "Dr. Death" (*The State of Texas v. Christopher Duntzsch*, F15-00411-L) to surgery residents at Methodist Hospital in Dallas, Texas;
- Attended a CLE entitled "Establishing Innocence or Guilt: The Reliability of Convictions" held February 26-28, 2019 at the Center for American and International Law in Plano, Texas;
- Performed various tasks as lead counsel in *Ex parte Juan Lizcano* (W05-59563-S(A)), a capital writ proceeding on remand from the Texas Court of Criminal Appeals, including reviewing the record from the 2-day live evidentiary hearing concerning intellectual disability and preparing Proposed Findings of Fact and Conclusions of Law filed on March 1, 2019;
- Assisted the attorney handling the March 28, 2019 scheduled execution of death row inmate Patrick Murphy (*The State of Texas v. Patrick Murphy*, F01-00328-T);
- Assisted the attorney handling the April 11, 2019 scheduled execution of death row inmate Mark Robertson (*The State of Texas v. Mark Robertson*, F89-85961-L);
- Prepared and presented a 1.5-hour case study on "Dr. Death" (*The State of Texas v. Christopher Duntzsch*, F15-00411-L) to the Amarillo Area Bar Association in Amarillo, Texas;
- Performed various tasks as one of the prosecutors on *The State of Texas v. Brenda Delgado* (F15-76401), including conducting research and responding to pretrial motions filed by the defense, presenting argument at pretrial hearings, and participating in the trial held May 17, May 31, and June 3-7, 2019;
- Prepared and presented a 1-hour CLE entitled "Anticipating Appellate Issues" and attended other training provided at TDCAA Homicide School held June 12-14, 2019, in San Marcos, Texas;

- Performed various tasks as lead counsel in *Ex parte Naim Muhammad* (W05-59563-S(A)), a capital writ proceeding, including reviewing the record from the 6-day live evidentiary hearing and preparing the State’s voluminous Proposed Findings of Fact and Conclusions of Law, filed on June 28, 2019;
- Prepared and presented a 1-hour CLE on “Jury Charges” to the attorneys of the Dallas County District Attorney’s Office on July 11, 2019;
- Performed various tasks as lead counsel in *Ex parte Steven Lynn Long* (W05-52918-R(B)), a capital writ proceeding on remand from the Texas Court of Criminal Appeals, including appearing for status conferences with the trial court, preparing the State’s voluminous files for post-conviction file review by defense counsel, and interviewing witnesses, reviewing records, and collecting evidence in preparation for the upcoming live evidentiary hearing concerning intellectual disability;
- Began working on *State of Texas v. Charles Wayne Phifer* (05-18-01232-CR), a capital murder direct appeal currently pending in this Court;
- Assisted the lead attorney handling the September 25, 2019 scheduled execution of death row inmate Robert Sparks (*State of Texas v. Robert Sparks*, F08-01020-J); and
- Conducted research and drafted the State’s response and proposed orders in 26 non-capital writ of habeas corpus cases.

Accordingly, the State respectfully requests an extension of time until September 23, 2019 to file its brief, which is being tendered with this motion.

Respectfully submitted,

/s/ Jaclyn O’Connor Lambert

JOHN CREUZOT  
*Criminal District Attorney*  
 Dallas County, Texas

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing motion for extension was electronically served on appellant's attorneys Robert Udashen, [rnu@udashenanton.com](mailto:rnu@udashenanton.com), and Brett Ordiway, [brett@udashenanton.com](mailto:brett@udashenanton.com), Udashen Anton, 2311 Cedar Springs Road, Suite 250, Dallas, Texas 75201, on September 23, 2019.

/s/ Jaclyn O'Connor Lambert  
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JACLYN O'CONNOR LAMBERT